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October 26, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *Amendment to the Commission's Rules Concerning Market Modification;
Implementation of Section 102 of the STELA Reauthorization Act of 2014 –
MB Docket No. 15-71***

Dear Ms. Dortch:

Consistent with the Commission's 2015 order in the above-referenced docket,¹ enclosed please find the results of DIRECTV's preliminary evaluation of its spot beam coverage for stations KGUN, KOLD, KMSB, and KVOA, each located in the Tucson, AZ DMA, for purposes of carriage in Pinal County, AZ.

Please contact me should you have any questions.

Respectfully submitted,

/s/ Amanda E. Potter

Amanda E. Potter

Enclosure

¹¹ *Amendment to the Commission's Rules Concerning Market Modification; Implementation of Section 102 of the STELA Reauthorization Act of 2014*, Report and Order, 30 FCC Rcd 10406 (2015).



Via FedEx

October 24, 2018

Joe Pyritz
Public Information Officer
Pinal County
135 North Pinal Street
Florence, AZ 85232

Dear Mr. Pyritz:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for **five zip codes in Pinal County, AZ**.

DIRECTV's engineering staff was given the five zip codes to evaluate for stations **KGUN, KOLD, KMSB, and KVOA** on our **Tucson, AZ** spot beam, and have found that:

- DIRECTV's SD and HD spot beams cover **all five** zip codes requested in **Pinal County: 85192, 85618, 85623, 85631, and 85739**

However, please note that KGUN, KOLD, KMSB, and KVOA would all currently qualify under the "duplicating signals" exception to DBS providers' broadcast carriage obligations in Pinal County.¹

In addition, in the event that any of these four Tucson stations were to be carried by DIRECTV in Pinal County, customers with SD equipment in Pinal County would need to obtain HD equipment in order to receive them.

DIRECTV did not evaluate spot beam coverage for Tucson, AZ station KUAT because it is a non-commercial educational station, and as such, is not eligible for a market modification. See 47 U.S.C. § 338(l).

DIRECTV will forward the results of this preliminary evaluation to the FCC for their records. Thank you for your letter and your interest in DIRECTV programming.

¹ See 47 U.S.C. § 338(c)(1); 47 C.F.R. § 76.66(h); *Amendment to the Commission's Rules Concerning Market Modification; Implementation of Section 102 of the STELA Reauthorization Act of 2014*, Report and Order, 30 FCC Rcd 10406 ¶ 28 n.146 (confirming that the "duplicating signals" exception continues to apply "to stations in communities that have been added to their markets via the market modification process"); see also *Gray Television Licensee, LLC, for Modification of the Television Market for WYMT-TV, Hazard, Kentucky*, Memorandum Opinion and Order, MB Docket No. 18-8, DA 18-500, ¶¶ 21-22 (MB rel. May 16, 2018).



Sincerely,

DIRECTV

Form of Certification Regarding Spot Beam Coverage

1. My name is Constance Goshgarian. I am VP Systems Engineering and Architecture at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KGUN	AZ	PINAL

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:

- The measured performance of the spot beam covering this Television Station's local market.
- Estimated atmospheric effects for reception of the signal.
- Estimated levels of interference.
- The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
- The target availability figure used for all television stations offered on the spot beam.

4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:

- Signal availability.
- Clear sky signal margin.
- Total carrier-to- interference ratio.

5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.

6. Based on this analysis, DIRECTV:

☒HD ☒SD Can provide service to all the zip codes associated with this request.*

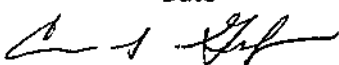
☐HD ☐SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.

☐HD ☐SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

* IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/15/18
Date


Signature

Thursday, October 11, 2018

Form of Certification Regarding Spot Beam Coverage

1. My name is Constance Goshgarian. I am VP Systems Engineering and Architecture at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KMSB	AZ	PINAL

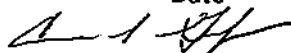
3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
 - a. The measured performance of the spot beam covering this Television Station's local market.
 - b. Estimated atmospheric effects for reception of the signal.
 - c. Estimated levels of interference.
 - d. The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
 - e. The target availability figure used for all television stations offered on the spot beam.
4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
 - a. Signal availability.
 - b. Clear sky signal margin.
 - c. Total carrier-to- interference ratio.
5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
6. Based on this analysis, DIRECTV:
☒HD ☒SD Can provide service to all the zip codes associated with this request.*
☐HD ☐SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
☐HD ☐SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

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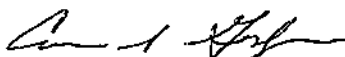
Station	State	County
KOLD	AZ	PINAL

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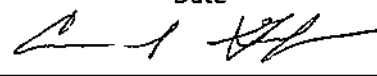
Station	State	County
KVOA	AZ	PINAL

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
 - a. The measured performance of the spot beam covering this Television Station's local market.
 - b. Estimated atmospheric effects for reception of the signal.
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